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June 1, 1995

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: **Ex Parte Presentation, CC Docket No. 92-297**

Dear Mr. Caton:

On May 23 and 24, 1995, Frederick L. Judge, President and CEO of Titan Information Systems Corporation ("Titan"), and Robert L. Montgomery, V.P. of Marketing for the Broadcast Communications business unit of Titan, met with Commission officials to discuss the licensing of LMDS in the 28 GHz band. During some of these meetings, questions were raised about specific technical issues. As a follow-up to those meetings, enclosed are letters that were hand-delivered to Scott Blake Harris and Gregory L. Rosston responding to particular questions.

An original and two (2) copies of this letter, and the letters to Mr. Harris and Mr. Rosston, are enclosed. Please contact the undersigned with any questions.

Sincerely,

TITAN INFORMATION SYSTEMS

A handwritten signature in cursive script, appearing to read "J. de Ruyter".

Janneke de Ruyter
Administration Manager

Enclosures

cc: Scott Blake Harris (w/o encs.)
Gregory L. Rosston (w/o encs.)
Frederick L. Judge (w/o encs.)

slc

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May 31, 1995

Mr. Scott Blake Harris
Chief, International Bureau
Federal Communications Commission
2000 M Street, N.W.
Room 822
Washington, DC 20554

Dear Mr. Harris:

At our meeting on May 23, 1995 you requested Titan's analysis of the need for at least 50 channels of programming for LMDS video services. The 50 channels that we referred to is based on the need for LMDS to offer sufficient programming to be able to compete in urban markets with cable.

Cable systems offer, or will offer, 50 or more programming channels in the geographical areas where LMDS will compete. To compete, LMDS must be able to provide at least this minimum number of channels.

The value of increased programming choice is recognized as a vital factor in customer acceptance, as evidenced by the fact that cable has historically added more channels to increase the value of their offerings. Historically, other services which offer less viewing choices than cable have suffered when competing with cable. Examples include early direct-to-home satellite systems and MMDS, which have had serious difficulty in competing with cable.

Titan's studies show that for LMDS to compete successfully with cable, signal quality must be equal, or better than, cable and the program offerings must include at minimum the following:

1. Eight highest premium services
2. Thirty highest rated satellite delivered basic programs services
3. Five networks
4. Three larger independent channels (e.g., super-stations).
5. At least two pay-per-view channels
6. At least two specialized programming channels.

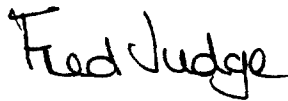
Mr. Scott Blake Harris

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May 31, 1995

Thus, in order to offer consumers a competitive choice of programming, LMDS service providers will require at least 50 program channels. Less channels would have a serious negative impact on the ability of LMDS service providers to develop successful business.

Sincerely,

A handwritten signature in black ink that reads "Fred Judge". The signature is written in a cursive, slightly stylized font.

Frederick L. Judge
President & CEO

slc



May 31, 1995

Mr. Gregory L. Rosston
Office of Plans and Policy
Federal Communications Commission
1919 M Street, N.W.
Room 822
Washington, DC 20554

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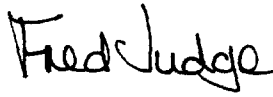
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Frederick L. Judge
President & CEO

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